

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. 8:24-cr-00098-FWS

Plaintiff,

I N F O R M A T I O N

v.

[18 U.S.C. § 1343: Wire Fraud;
18 U.S.C. § 982: Criminal
Forfeiture]

LUIS A. ROMERO,
aka "Luis A. Romero-
Navarette,"
aka "Luis A. Romero-
Navarrete,"

Defendant.

The United States Attorney charges:

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant LUIS A. ROMERO, also known as ("aka") "Luis A. Romero-Navarette," aka "Luis A. Romero-Navarrete," operated Zera Financial LLC ("Zera Financial") located in Westminster, California.

1 2. Through a public website, mobile application,
2 Instagram account, and word of mouth, defendant ROMERO touted
3 Zera Financial as a "unique financial provider" that helps
4 investors "acquire healthy financial growth through the
5 accumulation of savings."

6 3. Defendant ROMERO offered investors the opportunity to
7 deposit money with Zera Financial, promised a 3% fixed monthly
8 return, and represented that investors could withdraw their
9 returns at any time.

10 B. THE SCHEME TO DEFRAUD

11 4. Beginning in or around January 2021 and continuing
12 until at least in or around August 2023, in Orange County,
13 within the Central District of California, and elsewhere,
14 defendant ROMERO, knowingly and with intent to defraud, devised,
15 participated in, and executed a scheme to obtain money and
16 property from investors of Zera Financial by means of material
17 false and fraudulent pretenses, representations, and promises,
18 and the concealment of material facts.

19 5. The fraudulent scheme operated, in substance, as
20 follows:

21 a. Defendant ROMERO, through Zera Financial,
22 solicited investors to deposit money with Zera Financial,
23 promising a fixed monthly return.

24 b. Defendant ROMERO told investors that their
25 investments were fully secured by the Federal Deposit Insurance
26 Corporation ("FDIC") and, even if Zera Financial collapsed,
27 investors would receive their initial investment from the FDIC.

1 c. In reality, Zera Financial was not insured by the
2 FDIC and defendant ROMERO paid returns using other investor
3 funds in a Ponzi-like fashion.

4 6. Based on the fraudulent scheme above, defendant ROMERO
5 caused approximately 86 investors to lose over \$1 million.

6 C. THE USE OF AN INTERSTATE WIRE

7 7. On or about January 26, 2023, in Orange County, within
8 the Central District of California, and elsewhere, for the
9 purpose of executing the above-described scheme to defraud,
10 defendant ROMERO caused the transmission of \$35,000 from victim
11 investor N.V.G.'s Charles Schwab account to Zera Financial's
12 U.S. Bank account located in Irvine, California for an
13 investment in Zera Financial. This fund transfer was processed
14 through two data centers located in New Jersey and Texas.

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1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 982]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of
4 Criminal Procedure, notice is hereby given that the United
5 States of America will seek forfeiture as part of any sentence,
6 pursuant to Title 18, United States Code, Section 982(a)(2), in
7 the event of the defendant's conviction of the offense set forth
8 in Count One of this Information.

9 2. The defendant, if so convicted, shall forfeit to the
10 United States of America the following:

11 (a) All right, title and interest in any and all
12 property, real or personal, constituting, or derived from, any
13 proceeds obtained, directly or indirectly, as a result of the
14 offense; and

15 (b) To the extent such property is not available for
16 forfeiture, a sum of money equal to the total value of the
17 property described in subparagraph (a).

18 3. Pursuant to Title 21, United States Code, Section
19 853(p), as incorporated by Title 18, United States Code, Section
20 982(b), the defendant, if so convicted, shall forfeit substitute
21 property, up to the total value of the property described in the
22 preceding paragraph if, as the result of any act or omission of
23 the defendant, the property described in the preceding
24 paragraph, or any portion thereof: (a) cannot be located upon
25 the exercise of due diligence; (b) has been transferred, sold to
26 or deposited with a third party; (c) has been placed beyond the
27 jurisdiction of the court; (d) has been substantially diminished

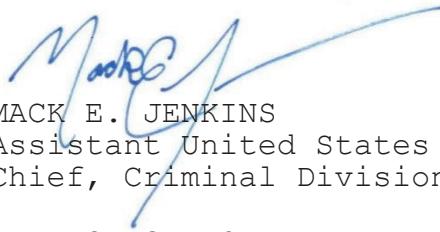
1 in value; or (e) has been commingled with other property that
2 cannot be divided without difficulty.

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E. MARTIN ESTRADA
United States Attorney

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7 MACK E. JENKINS
8 Assistant United States Attorney
Chief, Criminal Division

9 ANNE C. GANNON
10 Assistant United States Attorney
Chief, Santa Ana Branch Office

11 JENNIFER L. WAIER
12 Assistant United States Attorney
Deputy Chief, Santa Ana Branch Office

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